

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

Lee Waddell a/k/a Lee Charles Waddell,
Debtor.

Case No. 12-12411 (Chapter 7)

**NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC
STAY PURSUANT TO 11 U.S.C. §362(d)(1)**

PLEASE TAKE NOTICE that upon the Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. Section 362, Adam Conway, Creditor, will move at a hearing to be held at the United States Bankruptcy Court, 445 Broadway, Albany, NY on the 14th day of November, 2012 at 9:15 a.m. of that day, or as soon thereafter as counsel can be heard, for an Order, pursuant to 11 U.S.C. §362, granting such Creditor relief from the automatic stay, to permit Creditor to take action in New York State Supreme Court, Albany County, to enforce a restrictive covenant and So Ordered Settlement Stipulation which prohibits the Debtor from performing DJ services in the Capital District, based on evidence obtained by the Creditor that the Debtor has, subsequent to the bankruptcy filing, illegally performed said DJ services and such further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE THAT PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULES 9013-1 and 9013-4, IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON THE MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION NOT LATER THAN 4:00 P.M. EASTERN STANDARD TIME SEVEN (7) DAYS PRIOR TO THE RETURN DATE OF THIS MOTION. IN THE EVENT NO WRITTEN OPPOSITION IS SERVED AND FILED, NO HEARING ON THE MOTION WILL BE HELD BEFORE THE COURT ON THE RETURN DATE, AND THE COURT WILL CONSIDER THE MOTION AS UNOPPOSED.

DATED: October 23, 2012
Albany, New York

Yours, etc.

GANZ, WOLKENBREIT & SIEGFELD, LLP

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